

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

Mar 17, 2020

In Re:

FORESIGHT ENERGY, LP, et al

Debtors.

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Case No. 20-41308  
Chapter 11

Kathy A. Surratt - States  
KATHY A. SURRETT-STATES  
Chief United States Bankruptcy Judge

**VERIFIED MOTION OF ERIKA L. TODD FOR  
ADMISSION PRO HAC VICE**

Pursuant to the Local Rules of the United States Bankruptcy Court for the Eastern District of Missouri, and Rule 12.01(F) of the Local Rules of the United States District Court for the Eastern District of Missouri, ERIKA L. TODD of the firm Sullivan & Worcester, together with Marshall C. Turner of the firm Husch Blackwell LLP, and move for admission of ERIKA L. TODD *pro hac vice* in the above-captioned chapter 11 case, and in support thereof state as follows:

1. ERIKA L. TODD is an attorney in the law firm of Sullivan & Worcester, One Post Office Square, Boston, MA 02109. Her phone number is 617-338-2825. Her facsimile number is 617-338-2880 and email is [etodd@sullivanlaw.com](mailto:etodd@sullivanlaw.com).
2. Ms. Todd is a graduate of Harvard Law School, 2013. Ms. Todd was admitted to the Bar of the Commonwealth of Massachusetts in 2013. She is also admitted to practice before the U.S. District Court, Massachusetts; U.S. Court of Appeals, 1<sup>st</sup> Circuit; U.S. Court of Federal Claims; and Supreme Court of the United States.
3. Ms. Todd is a member in good standing of all bars of which she is a member and she is not under suspension or disbarment from any bar.

4. Ms. Todd does not reside in the Eastern District of Missouri, is not regularly employed in the Eastern District of Missouri, and is not regularly engaged in the practice of law in the Eastern District of Missouri.

5. Ms. Todd will represent creditor Lord Securities Corporation, in its capacity as First Lien Term Loan Agent and Collateral Trustee, in this matter and co-counsel in this matter is Marshall C. Turner, a member in good standing of the Bar for the U.S. District Court for the Eastern District of Missouri.

WHEREFORE, ERIKA L. TODD attests under penalty of perjury to the truth and accuracy of the foregoing facts, and respectfully requests that this motion be granted and that she be admitted *pro hac vice* in connection with the above-captioned case, and for such other and further relief as is just.

Dated: March 16, 2020  
Boston, MA

/s/ Erika L. Todd  
Erika L. Todd  
Sullivan & Worcester LLP  
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Respectfully submitted,

HUSCH BLACKWELL LLP

By: /s/ Marshall C. Turner

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*Attorneys for Lord Securities Corporation*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Motion was filed on March 16, 2020 and that a true and correct copy of the Motion was served through this Court's CM/ECF system to all parties receiving notice thereby.

/s/ Marshall C. Turner

Marshall C. Turner